

COMMONWEALTH OF PUERTO RICO
PUBLIC SERVICE REGULATORY BOARD
PUERTO RICO ENERGY BUREAU

2019 JUN 11 PM 4: 29

IN RE: REVIEW OF THE PUERTO
RICO ELECTRIC POWER
AUTHORITY INTEGRATED
RESOURCE PLAN

NO. CEPR-AP-2018-0001

SUBJECT: PREPA'S INFORMATIVE
MOTION AND MOTION TO
COORDINATE OVERLAPPING
SCHEDULES

**PREPA'S INFORMATIVE MOTION AND
MOTION TO COORDINATE OVERLAPPING SCHEDULES**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority ("PREPA") and respectfully submits, to the honorable Puerto Rico Energy Bureau (the "Energy Bureau"), PREPA's Informative Motion and Motion to Coordinate Overlapping Schedules.

PREPA's Informative Motion relates primarily to the electronic work papers required to be filed as part of the 2018-2019 Integrated Resource Plan ("IRP") filing on June 7, 2019. The electronic work papers have required work on cleaning, legibility, and confidentiality designations in order to comply with the Energy Bureau's Regulation No. 9021, § 2.02(F)(1) and the Energy Bureau's orders. The Informative Motion also involves a redacted version of IRP Appendix 1 (redacted for Critical Energy Infrastructure Information or "CEII"). **PREPA plans and proposes to submit the compliant supplemental electronic work papers on a USB drive on a rolling basis starting today and concluding in three days, on June 14, 2019.**

PREPA's Motion to Coordinate Overlapping Schedules relates to the fact that, under the combination of the Energy Bureau's orders of April 26, May 23, June 5, and June 10, 2019, in the instant docket, and a Bureau order of April 25, 2019, in the 2015

rate implementation docket (CEPR-AP-2015-0001), **PREPA now has four major filings due in these two cases on the same date, June 14, 2019:**

1. The 2018-2019 IRP testimony required by the June 5th IRP case order;
2. The modeling runs and other data required by the April 26 and May 23rd IRP case orders;
3. The minigrids filing required by the June 10th IRP case order; and
4. The filing relating to factors and reconciliation for quarterly and annual riders going into effect on July 1st, required under the April 25th order in the 2015 rate implementation docket.¹

PREPA does NOT propose to change the June 14th due date for the 2018-2019 IRP testimony.

However, PREPA proposes to change the due dates for the *other three filings*. PREPA will address the two IRP items as to which it seeks a schedule change in the instant motion. PREPA will address the 2015 rate implementation item in a parallel Motion to be filed in that docket.

I. INFORMATIVE MOTION

One of the required elements of the June 7, 2019, IRP filing was the electronic work papers required to be provided in native format by Reg. No. 9021, § 2.02(F)(1).

On June 7th, as PREPA conducted review of the final electronic work papers provided by its independent IRP experts, Siemens PTI, PREPA identified concerns that

¹ As a result of PREPA's June 5, 2019, compliance filing in the 2015 rate implementation docket, and the June 10 Technical Conference Call in that docket, PREPA also has a follow-up compliance filing due on June 19, 2019, in that docket.

the work papers required additional work on cleaning, legibility, and confidentiality designations in order to comply with the Energy Bureau's Regulation No. 9021, § 2.02(F)(1) and the Energy Bureau's orders.

PREPA, working with Siemens, is performing the required additional work and plans and proposes to file the supplemental electronic work papers on USB drives starting today and concluding in three days, on June 14, 2019. Please note that many of the electronic work papers are confidential, generally due to the inclusion of Critical Energy Infrastructure Information ("CEII").

Accordingly, PREPA respectfully requests that the Energy Bureau accept the compliant electronic work papers.

II. MOTION TO COORDINATE OVERLAPPING SCHEDULES

As discussed above, PREPA has three major filings in the 2018-2019 IRP case and one major filing in the 2015 rate implementation docket due all on the same day, June 14, 2019.

PREPA does NOT propose to change the June 14th due date for the 2018-2019 IRP testimony.

However, PREPA proposes to change the due dates for the *other three* filings.

Finalizing all four major filings on the same date is not practical and raises the risk that elements of a filing will be incorrect or non-compliant. In addition, the minigrids filing requirement of the Energy Bureau's June 10, 2019, order was unexpected, and therefore has not been the subject of work to date, and to prepare it necessarily will involve the same PREPA and Siemens teams who are working on the 2018-2019 IRP testimony that

is due on June 14, 2019. Furthermore, the modeling runs and other data required by the April 26th order as expanded by the May 23rd order and taking into account the Energy Bureau's other directives regarding the IRP will require Siemens to perform extensive additional modeling work that Siemens estimates it can complete by no earlier than July 1, 2019. In addition, the Motion being filed in the 2015 rate implementation docket discusses the fact that the required factors and reconciliations filing in that docket in part involves a requirement of financial data that PREPA's financial processes will not be able to generate by June 14th, as is discussed in the separate Motion being filed in that other docket.

Given the foregoing, with respect to the instant IRP case, PREPA proposes that:

1. The minigrids filing required by the June 10th IRP case order be due on June 28, 2019; and
2. The modeling runs and other data required by the April 26 and May 23rd IRP case orders be due on July 1, 2019.²

PREPA believes that the additional time it is requesting is the minimum additional time that it should request consistent with performing its responsibilities relating to preparing correct and compliant filings and based on the information from Siemens.

² PREPA will address in its Motion in the 2015 rate implementation docket a proposed due date for the filing relating to factors and reconciliation for quarterly and annual riders going into effect on July 1st, required under the April 25th order in the 2015 rate implementation docket.

WHEREFORE, the Puerto Rico Electric Power Authority respectfully requests that the Honorable Puerto Rico Energy Bureau accept these Motions; accept the electronic work papers; set the due date for the minigrids filing as June 28, 2019; set the due date for the additional modeling and data as July 1, 2019; and, enter such other relief as is warranted.

RESPECTFULLY SUBMITTED,

IN SAN JUAN, PUERTO RICO, THIS 11th DAY OF JUNE, 2019

PUERTO RICO ELECTRIC POWER AUTHORITY

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CERTIFICATION OF FILING AND SERVICE

I hereby certify that on June 11, 2019, I have filed the above combined Motions with the Puerto Rico Energy Bureau in hard copy format at the office of the Clerk of the Puerto Rico Energy Bureau; and, further, at approximately the same time, that courtesy copies of the filing were sent via email to the Puerto Rico Energy Bureau via email to secretaria@energia.pr.gov and mcintron@energia.pr.gov, and to the office of the Energy Bureau's internal legal counsel via email to legal@energia.pr.gov and sugarte@energia.pr.gov.

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